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20 **UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

21 CHANAAZ MANGROE
22 p/k/a Channii Monroe,

23 Plaintiff,

24 vs.

25 TERIUS GESTEELDE-DIAMANT
26 p/k/a "THE-DREAM"; CONTRA
27 PARIS, LLC; and EPIC RECORDS,

28 Defendants.

Case No. _____

**COMPLAINT SEEKING
DAMAGES**

JURY TRIAL DEMANDED

25 **TRIGGER WARNING:**

26 **THIS DOCUMENT CONTAINS HIGHLY GRAPHIC INFORMATION OF A
27 SEXUAL NATURE, INCLUDING SEXUAL ASSAULT**

28 **COMPLAINT SEEKING DAMAGES**

1 Plaintiff Chanaaz Mangroe p/k/a Channii Monroe (“Plaintiff” or “Ms.
 2 Mangroe”) hereby alleges, by and through her undersigned counsel, Wigdor LLP
 3 and Girard Bengali, APC, as and for her Complaint against Defendants Terius “The-
 4 Dream” Gesteelde-Diamant (formerly known as Terius Youngdell Nash) (“Dream”);
 5 Contra Paris, LLC (“Contra Paris”); and Epic Records (“Epic”) (together
 6 “Defendants”) as follows:

7 PRELIMINARY STATEMENT

8 1. The-Dream is an award-winning singer, songwriter, and producer who
 9 has risen to fame writing and producing songs for the musical stars of the last two
 10 decades. He has been hailed as one of the prolific hit makers in the industry and is
 11 considered innovative and incredibly talented.

12 2. He has fashioned himself as a champion of art and artists, once calling
 13 major record labels “evil” and stating that “artists are treated like slaves” in the
 14 record industry.¹

15 3. In 2014, Ms. Chanaaz Mangroe was 23 years old, working in the United
 16 States on an international visa from the Netherlands, hoping to land her big break as
 17 a singer and songwriter.

18 4. When associates of Dream reached out to Ms. Mangroe via social
 19 media, she was thrilled—she immediately sent along samples of her work and was
 20 quickly invited to join Dream and his partner Tricky Stewart in Atlanta.

21 5. Far from being the amazing breakthrough opportunity she imagined,
 22 Ms. Mangroe’s experience with Dream was nothing short of a prolonged nightmare.

23 6. Under the guise of pursuing a legitimate recording and publishing
 24 contract with Ms. Mangroe, Dream lured the young and vulnerable artist into an

25
 26 ¹ [https://www.billboard.com/music/rb-hip-hop/the-dream-artists-are-treated-like-](https://www.billboard.com/music/rb-hip-hop/the-dream-artists-are-treated-like-slaves-music-business-contra-paris-6605182/)
 27 [slaves-music-business-contra-paris-6605182/](https://www.billboard.com/music/rb-hip-hop/the-dream-artists-are-treated-like-slaves-music-business-contra-paris-6605182/)

1 abusive, violent, and manipulative relationship filled with physical assaults, violent
2 sexual encounters, and horrific psychological manipulation.

3 7. In both Atlanta and Los Angeles, Dream used his age and influence in
4 the industry to manipulate the young artist into believing that she needed him to be
5 successful, and roped her into his world through false promises to gain Ms.
6 Mangroe's complete trust, including:

- 7 • Assuring her that he would sponsor the extension of her international
8 visa;
- 9 • Telling her he would write blockbuster songs for her if she became part
10 of his so-called "sanctuary," like he did for Beyonce² and Rihanna;
- 11 • Offering her lofty visions of recording and publishing contracts with
12 major labels, assuring her he would appropriately advocate for her; and
- 13 • Promising her she would open for Beyonce's upcoming tour, going as
14 far to force Ms. Mangroe to diet and exercise excessively to prepare for
15 the tour.

16 8. In reality, Dream used Ms. Mangroe for his base desires, which
17 manifested in violent sexual acts and vicious psychological torture. For example:

- 18 • Dream locked Ms. Mangroe in a dark room adjacent to a recording
19 studio, violently having sex with her and then leaving her alone, naked
20 in the dark, for hours on end, returning to again have sex with her and
21 demand that she tell him she loved him.

22
23
24 2 An April 1, 2024 *New Yorker* article emphasizes the close relationship between
25 Dream and Beyonce, going so far as to call Dream her "musical soul mate." See
26 <https://www.newyorker.com/culture/cultural-comment/can-beyonce-ever-burn-down-the-barn>. As will be detailed herein, Dream regularly used the success he reached working
27 with Beyonce to excuse his violent, coercive, and manipulative behavior.

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- Dream controlled all aspects of Ms. Mangroe's stay in the United States, including providing her housing, transportation, and food expenses. He kept a close track of her location at all times, calling and texting her at all hours to demand updates on her location, or even keeping his own key to Ms. Mangroe's hotel room so that he could enter whenever he pleased with no notice.
 - Dream forced Ms. Mangroe to drink excessive amounts of alcohol by roughly pulling her head back by her hair and pouring alcohol down her throat.
 - Dream frequently strangled Ms. Mangroe during violent sex, sometimes with his hands, and once using the collar of her dress. On multiple occasions, Dream choked Ms. Mangroe so intensely that she almost lost consciousness.
 - Dream refused to wear a condom and regularly ejaculated inside of Ms. Mangroe against her protests. When he discovered she was taking birth control, he became enraged because he believed it to be a sign of disrespect. She was forced to hide her birth control pills under a mattress.
 - Dream berated Ms. Mangroe while having sex with her, calling her ungrateful and insisting that she praise him and declare her loyalty to him.
 - Dream once raped Ms. Mangroe in the back of a renovated sprinter van, the same evening that he forced her to engage in sex acts in a public movie theater.

- Dream recorded Ms. Mangroe during sexual acts and used the existence of the recording to threaten Ms. Mangroe into silence.

9. His depraved behavior was facilitated by his record label, Contra Paris LLC, as well as by Epic Records—the label Dream convinced to invest in Ms. Mangro, despite the fact that he never intended to truly support her career trajectory, but instead wanted corporate funding to assist in his trafficking venture.

10. The result of Dream's heinous acts was that Ms. Mangroe's career was upended—her music was taken from her without any explanation, Contra Paris never provided her any compensation, and every attempt to revive her career has been hijacked by Dream and those who support him.

11. Over more than a year, Ms. Mangroe experienced trauma that she has still not recovered from—she is broken as an artist, constantly afraid for her physical safety, and plagued by reminders of the violence and control she experienced at the hands of Dream, who has continued his successful career unscathed by his horrific acts

12. Nearly a decade later, Ms. Mangroe is still putting the pieces of her life back together, but she knows that without speaking up about what Dream did to her, she will never be able to heal from the harm he has caused.

13. She therefore brings this lawsuit to speak up for herself and other female artists who have been tormented by powerful and selfish men in the recording industry. She seeks justice and accountability to prevent further horrific abuse like she experienced, and to regain her sense of self as an artist and as a woman.

JURISDICTION AND VENUE

14. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343, as this action asserts violations of 18 U.S.C. § 1591, *et seq.*, and therefore raises federal questions regarding the deprivation of Plaintiff’s rights. The Court has supplemental

1 jurisdiction over Plaintiff's related claims arising under state law pursuant to 28
2 U.S.C. § 1367(a).

3 15. Pursuant to 28 U.S.C. § 1333(b), venue is proper in this Court because
4 a substantial part of the events or omissions giving rise to this action, including the
5 intentional and negligent tortious conduct alleged herein, occurred in this District.

PARTIES

7 16. Plaintiff Chanaaz Mangroe is a 33-year-old woman and is domiciled in
8 the Netherlands.

9 17. Defendant Terius “Dream” Gesteelde-Diamant is, upon information
10 and belief, domiciled in Atlanta, Georgia.

11 18. Defendant Contra Paris, LLC is a limited liability company
12 incorporated in Delaware that executed a recording and shopping agreement with
13 Plaintiff that was, upon information and belief, owned and operated by Dream and
14 his partner Christopher “Tricky” Stewart during the relevant time period.

15 19. Defendant Epic Records is a record label owned by Sony Music
16 Entertainment that is headquartered in California.

FACTUAL ALLEGATIONS

I. The Dream Has Established Himself as a Talented and Powerful Songwriter and Producer and as a Violent Misogynist

20. Dream is a Grammy Award-winning singer, songwriter, and producer
21 known for authoring some of the most famous modern songs, including Rihanna's
22 "Umbrella," Justin Bieber's "Baby," Mariah Carey's "Touch My Body," and Kanye
23 West's "All of the Lights."

24 21. He is also known as a go-to producer and songwriter for Beyonce,
25 penning her hit songs, “Single Ladies (Put a Ring on It),” “Run the World (Girls),

1 “Partition,” and is listed in the credits on every album of Beyoncé’s since 2008,
2 including Beyoncé’s most recent *Cowboy Carter*.

3 22. His accomplishments earned him eight Grammy Awards and a
4 nomination for the newly created category of Songwriter of the Year at the 65th
5 Grammy Awards.

6 23. Dream also recorded and released his own music on various other
7 labels, including Def Jam Recordings and Capitol Records.

8 24. Dream is also well-connected in the business side of the music industry,
9 being named Executive Vice President of A&R at Def Jam Records in 2012, where
10 he signed and produced new artists to the label.

11 25. In 2014, Dream launched his own record label called Contra Paris. He
12 incorporated the label as a limited liability company, Contra Paris LLC, in Delaware
13 in December 2014.

14 26. According to Dream, Contra Paris was a “designer and culture label”
15 or an “art label,” founded along with Jay Z. As he said in one interview: “It’s about
16 art overall, period. Anything that’s art, we’re trying to get into. I have a lot of people
17 hitting me on Instagram, guys and girls, that are trying to fuse music with their
18 culture. Whatever that culture is, as long as it’s art.”³

19 27. It is not clear if Contra Paris ever signed any artists to its label (aside
20 from Ms. Mangrooe), or whether any records were released by the label. Today, the
21 Contra Paris website appears partially defunct, and seems to function as a
22 consignment shop for a handful of items of clothing that presumably belong to
23 Dream.

³ <https://hypebeast.com/2015/4/the-dream-and-jay-z-are-starting-an-art-label-together>

1 28. Dream has regularly maintained that he has a “soft spot” for women.
 2 In an interview with *New York Magazine*, he was commended for his songs
 3 celebrating “tough cookie feminism,” and was quoted as saying “I’ve always had a
 4 soft spot for women because of my mom. Just their power. Man’s biggest enemy is
 5 a woman who has it in for them. I just like being around them, watching, soaking
 6 up the information, being cursed out, being put out.”⁴ Another publication noted that
 7 Dream “has mostly cast himself as a worshipper of women, a put-them-on-a-pedestal
 8 type – not usually a healthy attitude, but in the R&B landscape he has stood out as a
 9 romantic.”⁵

10 29. Yet this feminist persona is plainly contradicted by the reality of
 11 Dream’s relationships with women and his highly-publicized arrests for domestic
 12 violence.

13 30. Dream has been married multiple times and has fathered nine children
 14 with four women.

15 31. In 2010, while married to singer Christina Milian, pictures of Dream
 16 and his assistant having an affair in the Caribbean leaked online. Dream then filed
 17 for divorce from his then-wife—all of nine days before Milian gave birth to the
 18 couple’s daughter. Later news stories reported that Milian’s divorce settlement was
 19 contingent on Milian’s agreement to never speak about their marriage.⁶

20 32. His chauvinism was further on display when asked about his role as a
 21 parent to his daughter. In an interview with *Essence Magazine*, when asked if he
 22 helped Milian with the baby, he said the following: “I don’t [help Milian out] because
 23 my ‘helping out’ turns into expectations. I’ll get Violet on a late night maybe one or

24 4 <https://nymag.com/arts/popmusic/features/66998/>
 25 5 <https://www.theguardian.com/music/2011/sep/08/the-dream-terius-nash-1977>
 26 6 <https://www.essence.com/news/christina-milian-dream-4-million-divorce-settlement/>

1 two times, but after that, no. If Christina's tired, call the nanny, call Violet's granny.
2 We got people."

3 33. In 2013, he shared that he was writing a book about relationships,
4 despite his multiple divorces, and was quoted saying, “But why get married? What
5 do they say? ‘Get the milk without the cow.’”⁷ Such a statement crudely refers to
6 women as cattle and further suggests that Dream does not think romantic
7 commitment is worthwhile if sex (i.e., “the milk”) could be achieved without the
8 commitment.

9 34. That same year, a mere month after making the statement quoted above,
10 Dream was arrested in California for a domestic violence incident with his girlfriend
11 at the time, who declined to press charges.

12 35. Less than a year later, however, Dream was again arrested on charges
13 of felony assault and strangulation, reckless endangerment, and child endangerment
14 of his girlfriend, who was pregnant at the time. The criminal complaint alleged that
15 Dream pulled and dragged his ex-girlfriend by her hair, choked her with a necklace
16 she was wearing, kicked her, punched her in the head, and grabbed her by the neck,
17 choking her again. His ex-girlfriend took photographs of the bruises Dream left of
18 her—those pictures, showing bruises on her arm and scratches on her neck and
19 wrists, were publicly released by TMZ.

20 36. Outrageously, Dream publicly insisted that his ex-girlfriend pressed
21 charges to protect her immigration status.

22 37. And ironically, Dream has been quoted in *Rolling Stone* as stating that
23 no one “takes the time to understand a man” or the psychological impacts on men
24 “with men not being able to work as much as they did when I was small. It’s not

<https://www.bet.com/article/7z2ah9/the-dream-to-pen-relationship-book>

1 about equal or not.”⁸ He went on to ask, “[w]hoever thought that the weakest part
 2 of life would be masculinity?”

3 38. When Plaintiff was first connected to Dream, she only knew of his
 4 reputation as a famous and accomplished songwriter and had not heard about his
 5 history of violence towards women. Those around Dream, however, and the
 6 businesses that supported his artistic endeavors, were aware of the violent
 7 misogynist that successfully hid his true self behind his songs of female empowerment.

8 **II. Ms. Mangroe is an Extraordinary Singer and Songwriter and
 9 Receives an O-1B Visa for Her Abilities in the Arts**

10 39. Ms. Mangroe was raised in the Netherlands with a passion, love, and
 11 extraordinary talent for writing and recording music. As a teenager, she began
 12 posting her songs on social media, developing a devoted following and catching the
 13 attention of several well-known producers around the world.

14 40. In 2012, when Ms. Mangroe was just 21 years old, she signed a
 15 production deal with U.S.-based production company Shapiro, Bernstein & Co., Inc.
 16 as a songwriter. As a result, she applied for a three-year O-1B visa for an “alien of
 17 extraordinary ability in the arts or extraordinary achievement in the motion picture
 18 or television industry.”

19 41. As the then-President of Shapiro, Bernstein & Co., Inc. wrote in support
 20 of Ms. Mangroe’s O1-B visa application, “Channii is an extraordinary artist who has
 21 established herself as one of the top Singer/Songwriters in Europe. At only 21 years
 22 old, Channii is on the short list of the music industry’s most coveted artists, achieving
 23 outstanding success in a relatively short period of time. She is sought after by the

24
 25 8 [https://www.rollingstone.com/music/music-features/the-dream-talks-love-after-](https://www.rollingstone.com/music/music-features/the-dream-talks-love-after-lemonade-why-he-deserves-legendary-status-106465/)
 26 [lemonade-why-he-deserves-legendary-status-106465/](https://www.rollingstone.com/music/music-features/the-dream-talks-love-after-lemonade-why-he-deserves-legendary-status-106465/).

1 top recording artists, record labels, producers, and insiders in the business and her
2 collaborations read like a who's who in the music industry."

3 42. In further support of Ms. Mangroe's application for an O-1B visa, the
4 Vice President of Membership for the American Society of Composers, Authors, and
5 Publishers wrote: "Channii is an extraordinarily talented artist. In her native Holland
6 she has earned a reputation as one of Europe's most compelling and creative
7 singer/songwriters...[i]t's not often that a foreign songwriter like Channii makes
8 such an impact this side of the Atlantic. It's a testament to her spectacular talent and
9 ability that at the tender age of 21 she is on the short list of the music industry's most
10 coveted artists."

11 43. Not surprisingly, Ms. Mangroe was awarded a three-year O-1B visa and
12 began frequently working in the United States throughout 2012-2015 as a songwriter
13 for Shapiro, Bernstein & Co., Inc.

14 44. Throughout this time, Ms. Mangroe continued to post her work on
15 social media, including Instagram, which is how she was ultimately connected with
16 Dream.

17 **III. Dream and His Team Make False Promises to Lure Ms. Mangroe to
18 Atlanta**

19 45. In late 2014, Ms. Mangroe was considering her options once her O-1B
20 visa expired by 2015. She knew that she wanted to focus on her own recording
21 career and, as a result, was speaking to several well-known producers about potential
22 next steps and sponsorship of her visa renewal.

23 46. It was around that same time in late 2014 that Dream's childhood friend
24 and personal security detail, Chris Garland ("Garland"), reached out to Ms. Mangroe
25

1 via Instagram and asked her to send him music to share with Dream's manager,
 2 Merck Mercuriadis ("Merck").⁹

3 47. At the time, Dream and his creative partner, Christopher "Tricky"
 4 Stewart ("Tricky") had reached enormous success, including producing and/or
 5 songwriting for Beyonce, Rihanna, Britney Spears, Mariah Carey, and Justin Bieber,
 6 producing five of his own studio albums, and receiving several Grammy Award
 7 nominations and multiple wins.

8 48. As a successful performer, songwriter, and producer, Dream seemed
 9 like the perfect fit for Ms. Mangroe, who was enormously talented in both
 10 performing and songwriting. Ms. Mangroe was thrilled at the opportunity to get her
 11 music in front of Dream and have the chance to work with someone who had
 12 significant connections and influence in the music industry. She therefore
 13 immediately sent Garland some of her music.

14 49. Garland quickly responded that he would arrange a meeting between
 15 Ms. Mangroe and Merck. Ms. Mangroe happily said that she would meet with
 16 Dream and/or his team.

17 50. In January 2015, while Ms. Mangroe was already in Los Angeles,
 18 Merck reached out to Ms. Mangroe to arrange for her to fly to Atlanta to meet Dream.

21 22 Although Garland told Ms. Mangroe that Merck was Dream's manager, she later
 23 learned that Mark Stewart ("Mark"), Tricky Stewart's brother, was in fact Dream's
 24 manager. The exact relationship between Dream and Merck at that time is unclear, but this
 25 misrepresentation was just one of many upon which Ms. Mangroe relied. However, he did
 26 assist in arranging the initial meeting between Ms. Mangroe and Dream and, in 2018, it
 27 was reported that the company that Merck founded, Hipgnosis, acquired the catalogs of
 28 both Dream and Tricky Stewart. See, e.g., <https://www.billboard.com/pro/hipgnosis-tricky-stewart-songwriting-catalog/>.

1 51. She arrived in Atlanta on January 29, 2015, where Garland picked her
2 up at the airport and told her that she would be meeting Dream at a club that evening
3 because Dream wanted to observe how she “handled herself” in a club atmosphere.

4 52. Several hours later, Ms. Mangroe met Dream, Tricky, and Garland in
5 front of Gold Room Club. Ms. Mangroe did not have any significant interaction
6 with Dream while they were in the club, but she was told to get into Dream’s car
7 with him and Garland at the end of the night. While they drove Ms. Mangroe back
8 to her hotel, Dream discussed taking her to a basketball game the following day.
9 When Ms. Mangroe attempted to turn the conversation to getting into the studio to
10 record, Dream confirmed she would have the chance to record during the trip.

11 53. The next day, on January 30, 2015, Ms. Mangroe went into a studio to
12 record with Dream’s sound engineer, Bart Schoudel (“Schoudel”).

13 54. During the recording session, Ms. Mangroe recorded a verse for the
14 song Transparent, which was supposed to be part of Dream’s forthcoming two-part
15 EP, Crown Jewel. While the official release of Crown Jewel was delayed, the song
16 eventually leaked online. Dream failed to give any credit (or compensation) to Ms.
17 Mangroe for her vocals.

18 55. On the following day, January 31, Ms. Mangroe went back to the studio
19 and recorded the song “187,” which Dream had written. Although Ms. Mangroe had
20 no gang affiliations or violent history, she was presented with a song titled with the
21 slang used for “murder.”

22 56. That evening Dream arranged for Ms. Mangroe to attend an Atlanta
23 Hawks basketball game with Schoudel, providing her with courtside seats. After the
24 game, Dream and several others, including Tricky and Garland, took Ms. Mangroe
25 to a strip club. At that point, Ms. Mangroe had not yet “earned” the right to have
26 Dream’s phone number, so arrangements were made through Garland.

57. Ms. Mangroe had never been to a strip club before. While there, Dream repeatedly handed Ms. Mangroe large stacks of cash and demanded that she throw the money at the strippers.

58. At one point, one of the strippers came to their table completely naked and Dream instructed the stripper to get on top of Ms. Mangroe. Ms. Mangroe was visibly uncomfortable with the situation.

59. Dream seemed to enjoy how uncomfortable Ms. Mangroe became. He laughed as Ms. Mangroe asked the stripper to leave and perform for Dream instead. Dream insisted that the stripper go back over to Ms. Mangroe several times throughout the evening.

60. The following day, on February 1, 2015, Dream texted Ms. Mangroe for the first time—an apparent sign that she passed the “tests” that Dream had been giving her.

61. After saying hello, the first thing Dream texted Ms. Mangroe was "Do you have a boyfriend, boyfriends aren't allowed. It's a distraction." Ms. Mangroe was surprised to be asked such a personal question so early on in her communications with Dream, but she wanted to be cooperative and responded in the negative.

62. As the end of her planned trip to Atlanta neared, Ms. Mangroe still was not given a recording contract or any indication that one would be forthcoming, but she remained optimistic because Dream and his team repeatedly expressed how impressed they were with her vocals and how much they liked her voice and her general style.

63. Finally, shortly before she was scheduled to leave, Dream told Ms. Mangrore that he wanted to sign her to his label, Contra Paris, LLC (“Contra”). Ms. Mangrore was so happy and overwhelmed with gratitude—it truly felt like everything

1 she had been working for was about to come to fruition. Dream told her that he
2 would make her the next Beyonce and Rihanna.

3 64. Ms. Mangroe explained in detail to Dream that her O-1 visa was set to
4 expire in November of that year and that she needed a new petitioner to continue her
5 visa for the following three years. She reiterated that she needed to know if he was
6 serious about signing her and supporting her O-1 visa because if not, she would need
7 to search for another petitioner.

8 65. Dream assured Ms. Mangroe that Contra would be her petitioner and
9 that she did not need to look for a petitioner to continue her visa. He promised that
10 she would receive an advance and written contract soon. He then asked if she would
11 go to Los Angeles with him for the next ten days to continue recording. Ms.
12 Mangroe agreed.

13 66. Ms. Mangroe, then just 23-years-old and in an entirely new and enticing
14 world, truly believed that all her dreams were about to come true. Unfortunately,
15 however, she would soon learn that it was just the start of a long nightmare.

18 67. From the moment Dream began texting Ms. Mangroe, he began
19 regaling her with stories about how he helped create Beyonce and Rihanna and
20 would do the same for her as long as she did everything he told her to do.

21 68. Dream told Ms. Mangroe that in order to write songs for her, he needed
22 to know everything about her, including everything that embarrassed her, upset her,
23 angered her, and excited her – every single thought she had.

24 69. Perhaps sensing Ms. Mangroe's hesitation and confusion, Dream said
25 that was how true songwriters and producers needed to operate in order to write the

1 right song for each artist. He said Ms. Mangroe needed to “belong” to him so they
 2 could become the next “Bey and Jay,” in reference to Beyonce and Jay-Z.

3 70. Dream knew how much Ms. Mangroe loved and admired Beyonce as
 4 an artist. He regularly used Ms. Mangroe’s admiration for Beyonce as a way to
 5 manipulate Ms. Mangroe, telling her that the only reason he achieved such great
 6 success with Beyonce is because they created a “sanctuary” together, which allowed
 7 him to know Beyonce in a way that others could not and, consequently, he could
 8 write the best songs for her.

9 71. Dream explained that a “sanctuary” was even stronger than a spousal
 10 connection because it was about “art.” Being part of a “sanctuary” with Dream
 11 meant that Ms. Mangroe was required to disclose all of her secrets and thoughts and
 12 become “trust partners” with him. He said that his relationship with Beyonce was
 13 so close that he knew about Beyonce’s pregnancy before her husband, Jay-Z.

14 72. For example, Dream texted Ms. Mangroe,

15
 16 I will need to know
 17 things u think or
 18 embarrassed about to
 19 the furthest extent
 20

21 I'm going to be your
 22 better half of this goes
 23 where I think it's going
 24

1 73. Dream reminded Ms. Mangroe that she better be “grateful” that he was
2 working with her because he was putting work on Beyonce’s album on hold, and
3 that if she wanted to reach the same level of success as Beyonce, she needed to
4 become as close to or closer to him than Beyonce. He said that meant that Ms.
5 Mangroe should ask and follow his advice on everything, rely on him to be her main
6 confidant, and limit her inner circle to only those people he approved of and trusted.

7 74. Dream also told Ms. Mangroe that if she “acted right” he would share
8 the specific formula he used with Beyonce, and that Ms. Mangroe and Beyonce
9 would be the only two artists with those industry secrets.

10 75. Dream routinely pointed out that he could make any new artist
11 successful, but he was choosing Ms. Mangroe so he expected her to “respect him
12 correctly.”

13 76. Dream frequently pitted Rihanna against Beyonce implying that
14 Rihanna was fighting for his attention and was frustrated that he was giving it to
15 Beyonce instead of her. He said that Rihanna was begging him for good records but
16 because of his special “sanctuary” relationship with Beyonce, he saved them for
17 Beyonce and that Ms. Mangroe could be part of that as well.

18 77. According to Dream, Rihanna was possessive over him and got angry
19 when he worked with Beyonce. In an apparent effort to reiterate how grateful Ms.
20 Mangroe should be for the opportunity to work with him, Dream told her that
21 Rihanna would frequently send him flowers and other gifts. He reiterated that
22 Rihanna had to “work” to make him give her hit records and he was choosing to
23 work with Ms. Mangroe instead.

24 78. In one of their earliest text exchanges, Dream asked Ms. Mangroe when
25 she lost her virginity, explaining that Rihanna had told him this information about

1 herself, insinuating that artists he worked closely with shared such intimate
2 information with him.

3 79. Dream led Ms. Mangroe to believe through manipulation and coercion
4 that if she allowed him to completely control every aspect of her life, they could
5 create the ultimate “sanctuary” that would surpass anything he accomplished with
6 Beyonce or Rihanna.

7 80. When Ms. Mangroe questioned the idea of the “sanctuary” or asked
8 Dream to clarify what he meant, she would receive evasive responses like the
9 following:

10
11 I let u know after we win
12 10 Grammys together

13
14 Right now u just have to
15 be free and let me
16 undress u emotionally do
17 I can know what's
18 underneath your heart

19
20 81. For a new artist, the thought of becoming the next Beyonce or Rihanna
21 was obviously intoxicating, and Ms. Mangroe was willing to work as hard as
22 possible to make her recording dreams come true.

1 82. Dream told Ms. Mangroe that he was working on Beyonce's new tour
2 and that if everything went well, Ms. Mangroe could open for her, but shared this
3 promise only in the context of his emotional manipulation of her:

4
5 I think the more freedom
6 u give me the more
7 relationships I will be
8 able to put u through
9 and in. I am a strait
10 forward person

11 Things like the Beyoncé
12 opening isn't a big deal
13 to get it done , that's my
14 family

15 83. Ms. Mangroe had no reason to disbelieve what Dream was telling her
16 at that time. He was successful, had made hit records with Beyonce and Rihanna,
17 and convinced her that two of the most successful recordings artists were dependent
18 on him for their success.

19 84. Dream regularly held his age and experience in the industry over Ms.
20 Mangroe, telling her that she simply did not understand how his methods were
21 necessary to success, and instilling in her that she should be grateful for his efforts
22 to help her, placing himself on a pedestal and emphasizing that her success was only
23 possible thanks to Dream. For example, he stated the following over text:

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It means more to me than u can
imagine. My risk should tell you
that, in your mind u should
know that I am risking
something far greater than
anyone ever has for and with
you.

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18
And it's because I know it's
beyond explanation

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25
U can't explain this so don't
even try and don't mention it,
that's why the government
denies things , it isn't because
it's not true , it's because I
lesser mind wouldn't even
understand so why stop the life
they have and change what they
love about there life, it's actually
a unselfish thing to hold in a
truth

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27
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85. Ms. Mangroe was drawn into a whirlwind of lofty messages like this
and was quickly convinced that she needed Dream to make it in the music industry,
and therefore was willing to take any and all direction from him. Only now does she
see that Dream was using fraud and coercion to manipulate her into believing that
she was being brought into a legitimate business arrangement, not a venture to use
her for Dream's violent sexual desires.

1 **V. Ms. Mangroe Goes to Los Angeles to Record Her Album and Dream**
2 **Begins a Horrific Pattern of Physical, Sexual, and Psychological**
3 **Manipulation and Abuse under the Guise of Creating “Art”**

4 86. On February 4, 2015, Ms. Mangroe arrived in Los Angeles directly
5 from Atlanta. Soon after she arrived, she began receiving messages from Dream that
6 were extremely flirtatious, including asking her if she wanted to lose her virginity
7 “again,” implying that he wanted to have sex with her.

8 87. That evening, Ms. Mangroe was in the studio (which was in Tricky
9 Stewart’s home) recording music. Dream complained that Ms. Mangroe needed to
10 “loosen up” for the sake of the music and pressured her to drink alcohol and smoke
11 marijuana in excessive quantities. Dream told her that “Rih smokes so much that
12 while she’s smoking one blunt, Jenn and Melissa already rollin’ the next one.” Even
13 though Ms. Mangroe did not enjoy using drugs and alcohol, she felt pressured to
14 meet Dream’s expectations of a hit artist.

15 88. Throughout the evening while they were in the recording studio, Dream
16 became more aggressive in pressuring Ms. Mangroe to have sex with him. He
17 assured her that sex with him was “part of the process” and he could only write hit
18 songs for her if she agreed to let him know everything about her.

19 89. In an effort to deter Dream, Ms. Mangroe tried to argue that she did not
20 want to do anything that could complicate making great music. In response, Dream
21 told her that that she agreed to be his “trust partner” and not listening to him and
22 doing what he wanted was a sign of disrespect.

23 90. Ms. Mangroe, who was alone in the United States and increasingly
24 confused and frightened about the situation she was in, tried to protest again.

1 91. Dream reiterated to Ms. Mangroe that she was part of something
2 special, that he let her into his sanctuary because she was so talented, and that she
3 was part of something bigger than anything she could understand.

4 92. In the studio, Dream began to touch Ms. Mangroe, and she pulled back,
5 suggesting that it was not a good idea to be flirtatious with others around. Dream
6 proceeded to take Ms. Mangroe through the house where the studio was located,
7 eventually bringing her to a pitch-black bedroom.

8 93. Upon arriving in a dark bedroom, Ms. Mangroe had no doubt about
9 what Dream's intentions were. She told Dream, "I don't know about this," and "I
10 don't want to ruin this." Dream responded by telling her this was "really important"
11 and that they did not have "time to waste." He insisted that this "will only make the
12 records that much better."

13 94. Dream then grabbed Ms. Mangroe's hands and placed them on his
14 genitals. He then quickly escalated, pushing her down on the bed and inserting his
15 penis into her.

16 95. Others in the studio began to look for Dream and Ms. Mangroe, causing
17 Dream to leave the bedroom to go back to the recording studio. When he did so, he
18 locked the bedroom door with Ms. Mangroe inside, naked, in the dark.

19 96. After some amount of time, Dream returned to the bedroom, and again
20 had sex with Ms. Mangroe. He did this repeatedly for several hours, leaving Ms.
21 Mangroe tired and confused. During this ordeal, Dream told her that "this was going
22 to be great" for Ms. Mangroe, and also demanded that Ms. Mangroe tell Dream that
23 she loved him—in fact, he would only stop aggressively having sex with her once
24 she said that she loved him.

25 97. When Dream finally let Ms. Mangroe leave the bedroom, it was around
26 6 a.m., the sun had risen, and most of the people from the studio had left. Tricky,

1 however, did see her and Dream leave the bedroom at that hour. She returned to her
2 hotel confused, but tried to remain grateful and hopeful for what she believed was
3 her big break.

4 98. Given Dream's pressure and insistence, Ms. Mangroe felt it was useless
5 to continue protesting. Instead, she tried to convince herself that it was a consensual
6 sexual interaction. It was easier to believe what Dream was saying than to face the
7 reality of the situation – that a famous and significantly older music producer was
8 using his influence and power to make a young woman on her own in a foreign
9 country have sex with him.

10 99. Dream later texted Ms. Mangroe and acknowledged that he pressured
11 her into having sex with him. In particular, he texted: “[e]ntering you is like walking
12 through a door of roses, sure there are thorns but isn’t it beautiful, diamonds can’t
13 be made without pressure nothing great can.”

14 100. On February 7, 2015, Dream texted Ms. Mangroe, “[w]e are married
15 through art. And I won’t ever let anyone take advantage of you and will perfect [sic]
16 you to the end. Like a knight.”

17 101. Unfortunately, it was Dream who Ms. Mangroe needed protection from
18 and there was no knight willing to help her when she needed it the most.

19 102. Throughout her time in Los Angeles, if Ms. Mangroe and Dream were
20 in the studio at the same time, he expected her to be available to have sex with him
21 whenever he demanded it.

22 103. Dream refused to use any protection. While she was in Los Angeles,
23 Ms. Mangroe became sick with strep throat and was given antibiotics to treat it. She
24 knew that antibiotics could lessen the effectiveness of birth control and begged
25 Dream not to ejaculate inside of her. He refused. At one point while they were in
26 Los Angeles, Ms. Mangroe physically tried to get away from him to avoid him

1 ejaculating inside of her and Dream held her arms down and ejaculated inside of her
 2 over her protests. This type of violent sex, control, and manipulation became more
 3 and more common as the days passed.

4 104. On or around February 13, 2015, Dream sent Ms. Mangroe sexually
 5 explicit texts, including one that said, “I wanted to fuck Ure bladder so hard that it
 6 made u piss all over me.”

7 105. In between sending those text messages, Dream texted Ms. Mangroe
 8 about the recording deals he was working on for her, including “...we will have
 9 major distribution in about 30 days so u better be ready.” Dream frequently used
 10 this type of manipulation where he intertwined business promises with violent sex.

11 106. On February 14, 2015, Dream texted Ms. Mangroe that she “must care
 12 about what [he] care[s] about” and said “Ure life is now u have way more room but
 13 I will care about those things in ur life like they are my own, Ure mother is my
 14 mother, Ure father Ure brother, Ure friends are mines, your enemies I will inherit as
 15 my enemies!” When Ms. Mangroe said she did not understand, Dream responded
 16 “This is that other shit. Blood in blood out.”

17 107. The following day, Dream left Los Angeles for work obligations and
 18 gave Ms. Mangroe permission to go home to Amsterdam as long as she moved to
 19 Atlanta within four days.

20 108. Ms. Mangroe was in a precarious state at the end of her Los Angeles
 21 trip. From a professional standpoint, Ms. Mangroe felt incredibly excited about the
 22 work she had done and could really see her visions of becoming a recording artist
 23 come true. However, she also felt increasingly confused with and fearful of Dream.
 24 He was volatile and quick to anger if she did not quickly comply with his demands;
 25 yet, in such a short period of time, he also told her that he loved her, would protect
 26 her and cared more about her than anyone else ever would. It was dizzying, which

1 was precisely Dream's intent in his campaign of psychological and physical
 2 manipulation.

3 **VI. Dream Convinces Ms. Mangroe to Move to Atlanta Where Dream's**
 4 **Manipulation and Abuse Escalates**

5 109. In order to convince Ms. Mangroe to move to Atlanta, Dream promised
 6 that the contract was forthcoming, that he would find her an apartment to live in, and
 7 that he would pay her expenses in Atlanta until she received her advance. As a result,
 8 Ms. Mangroe flew to Amsterdam on February 17, 2015 to pack all of her belongings
 9 and prepared to move to Atlanta.

10 110. On the day before she left Los Angeles for Amsterdam, Dream texted
 11 Ms. Mangroe “[h]opefully we will have a deal memo in place before u come back”
 12 to confirm that was the plan.

13 111. On the same day, during a text conversation with Ms. Mangroe, Dream
 14 texted that “...I will not let anyone disrespect you[;] this [contract] will be fair and
 15 respectful from my end period and I’m going to pay your adv out of pocket fyi. I
 16 also other than trick [Stewart] and mark [Stewart] would love to be involved in your
 17 management process.”

18 112. Before Ms. Mangroe could even respond to Dream’s promise that her
 19 contract deal would be fair and respectful, Dream said “I need to see inside that
 20 pussy tho. As Ure man. NOW. Go in the restroom pull Ure panties to the side and
 21 take a pic.”¹⁰

22 ¹⁰ It is unlikely a coincidence that “Panties to the Side” is the name of a song written
 23 and sung by Dream. In an interview with *Essence Magazine*, he said the following about
 24 that track: “It’s about a quickie. When you can’t really get into it all the way and you can’t
 25 take the panties all the way off, so you just push them to the side. Sometimes you do it just
 26 because it’s hot. You have no reason not to take your clothes off but you just keep them
 27 on. Everyone at ESSENCE.com should try it, call your man at work and tell him ‘I want
 28 you to come home and pull my panties to the side!’”

1 113. Because Ms. Mangroe is also a songwriter, she asked Dream whether
 2 the contract would include a publishing deal as well. In response, Dream said he
 3 would “love to do all of [her] stuff” and that he had “already told big Jon [a/k/a/ Jon
 4 Platt, the then Chairman and CEO of Warner/Chappell Music] once [Ms. Mangroe]
 5 was finished with label, [he] will get with him to get [her] pub deal in place.”

6 114. Dream then told Ms. Mangroe to have her attorney “put in any and all
 7 contracts that...[her] option is always to go with [Dream] if there ever is a departure
 8 of [Dream] and [T]rick working together.” This is what is referred to as a “key man”
 9 clause.

10 115. While Ms. Mangroe was in Amsterdam, Dream texted her incessantly
 11 asking whether she was behaving, where she was, and what she was doing.

12 116. On February 18, 2015, Dream told Ms. Mangroe via text message that
 13 Rihanna had just sent him a sexual text, a not-so-subtle hint to remind Ms. Mangroe
 14 to be grateful for him because Rihanna was allegedly interested in him.

15 117. On February 19, 2015, Dream texted Ms. Mangroe: “You belong to me
 16 now! I’m your mother and father and everything.”

17 118. When Ms. Mangroe arrived in Atlanta on February 21, 2015, Garland
 18 picked her up from the airport with a gun sitting between them in the SUV. He told
 19 Ms. Mangroe that she needed his protection because Atlanta was a “crazy place.”
 20 She discovered later that Garland was often carrying Dream’s guns because Dream
 21 had a pending domestic violence charge and was not permitted to have weapons.¹¹

22 119. Ms. Mangroe was put in an isolated Residence Inn, which was not
 23 within walking distance of anything. It did, however, allow Dream to come and go

24 ¹¹ Dream’s ex-girlfriend, Lydia Nam, filed a police report in November 2013 alleging
 25 that Dream strangled and physically assaulted her while she was pregnant in April 2013.
 26 The case was dismissed in March 2015. Presumably, Dream was not permitted to carry
 27 weapons while the case was pending.

1 as he pleased without detection. Dream had his own key to Ms. Mangroe's room
2 and reminded her that he could stop by at any time—and he frequently did enter her
3 hotel room with little or no notice.

4 120. Ms. Mangroe, who could not drive and was relying on Dream for
5 money for all of her expenses because she had not yet received her contract and
6 advance, was essentially trapped in the Residence Inn unless Garland took her
7 somewhere.

8 121. While she occasionally used Uber, Garland reiterated that it was a
9 safety concern and that Dream expected him to transport her.

10 122. Garland made sure to let Ms. Mangroe know how closely he was
11 watching her when she took Ubers, as he would ask her why the Uber driver took a
12 certain route, whether the driver was trying to talk to her, and how much she spoke
13 to the driver.

14 123. Dream became increasingly controlling after Ms. Mangroe moved to
15 Atlanta. He told Ms. Mangroe that she needed to check in with him every day, she
16 needed to be available to him whenever he called, and that she should depend only
17 on him for anything she needed.

18 124. Ms. Mangroe was no longer allowed to attend events or go to clubs with
19 Dream. She was expected to stay in her hotel unless she was recording or at the
20 gym. Garland regularly texted her to ask what she was eating and telling her to go
21 to the gym while making unannounced visits to “check on her.”

22 125. Dream forced Ms. Mangroe to change her social media handles to
23 include references to Contra Paris, and regularly demanded that she remove certain
24 posts from her social media, thereby further isolating her from the outside world.

1 126. Ms. Mangroe had to beg to go to the studio. She was never given a
2 schedule. Instead, she was just expected to be prepared to go whenever she was
3 called.

4 127. When she asked Dream if she could go to the studio, he would chastise
5 her and call her a brat. He would tell her that she had to stop thinking about only
6 herself, that he was an important producer who was working with a lot of important
7 people, and that he did not have time for her “nagging” about getting into the studio.

8 128. It was not at all what Ms. Mangroe expected after being in the studio
9 non-stop during her first visit to Atlanta and Los Angeles. Everything felt different
10 once she committed to living in Atlanta and was under Dream’s complete control.

11 129. In between berating Ms. Mangroe, Dream continued coming to her
12 hotel or meeting her in the studio whenever he wanted to demand sex. He also began
13 doing “walk throughs” of her hotel room to look through all of Ms. Mangroe’s
14 belongings, including her medication. He got angry when he discovered that Ms.
15 Mangroe was taking birth control pills and demanded that she throw them away.
16 According to Dream, it was a sign of disrespect to try to prevent a pregnancy by him.
17 Ms. Mangroe, who had no desire to be pregnant at that time, began hiding her birth
18 control pills under her mattress.

19 130. Not surprisingly, Ms. Mangroe had a pregnancy scare shortly after she
20 arrived to live in Atlanta. Dream sent Garland to buy a pregnancy test and when it
21 came back negative, Ms. Mangroe let Dream know via text. He immediately called
22 Ms. Mangroe and screamed at her for almost an hour because he said it was an insult
23 to him that she was happy that she was not pregnant.

24 131. In the very early morning of February 25, 2015, while at Triangle
25 Sounds Studio, Dream plied Ms. Mangroe with alcohol and marijuana and forced

1 her to have sex with him while he recorded it. Ms. Mangroe, who was highly
2 intoxicated, tried to stop Dream from recording, but he refused.

3 132. The next day, Garland told Ms. Mangroe that for a skinny girl, she had
4 nice curvy thighs. It was the first time Garland had ever made a comment about her
5 body. While she had no way of knowing whether that was a coincidence, it certainly
6 seemed designed to send a message that Dream shared the unconsented-to sex tape.
7 She was humiliated.

8 133. Dream would later regularly use the recording to threaten Ms. Mangroe
9 that he could share it with anyone he wanted.

10 134. Dream insisted that Ms. Mangroe tell him that she loved him. She
11 regularly had to send him text messages expressing how grateful and thankful she
12 was for him in order to avoid being screamed at for being a brat. She was also
13 expected to regularly buy him flowers to express her gratitude.

14 135. Dream began having Garland call Ms. Mangroe at all hours of the day
15 or night to ensure she was in her hotel room. If Ms. Mangroe was sleeping or
16 unavailable for any reason, Dream would get infuriated.

17 136. Dream and Garland also began monitoring the food that Ms. Mangroe
18 ate and how often she worked out because Dream thought she had gotten too thin
19 and wanted her to be curvier, specifically suggesting that she should change her body
20 in anticipation of the Beyonce tour that she would be able to open for. Ms. Mangroe
21 was often very hungry because Garland monitored what ate. If she mentioned
22 something she ate, Dream would tell her that she would need to work out extra hard
23 the next day.

24 137. Ms. Mangroe considered Garland to be something of a confidant when
25 she first arrived in Atlanta. He often asked how she was doing and was initially very
26 kind to her.

138. However, if she complained that she had not been to the studio for a few days or that she was stuck in her hotel room for several days in a row, Garland would tell her that all she needed to worry about was keeping Dream happy. As he explained in sum and substance, “if Dream says something is vanilla, even if you see and know it’s chocolate, if Dream tells you it’s vanilla, it’s vanilla.”

139. Garland casually made statements that he would kill anyone who had an issue with Dream. Given that he regularly displayed his gun, Ms. Mangrode took his statement as a veiled threat.

140. Ms. Mangroe continued to ask when she would be allowed back in the studio to record, but Dream continued to push it off. She also asked if she could start writing songs given that Dream said her deal would include a publishing/songwriting component, but she was not permitted to write anything. Dream considered it an insult that she asked, and accused her of insulting his songwriting.

141. Ms. Mangroe continued asking about her contract. On February 28, 2015, Dream said that her contract would be finished soon and again ordered Ms. Mangroe to ensure that her attorney inserted a “key man” clause into her contract with Contra Paris (the “Contra Contract”). As Dream wrote in an email to Ms. Mangroe, “Basically no matter terms or partners, ultimately you choose to exit binding participants in contract other than Terius Nash [a/k/a/ Dream]. If [D]ream goes you go. Still remaining bonded to Terius the-dream Nash¹² for remaining term of contract if any.”

¹² Upon information and belief, Dream legally changed his name from Terius Nash to Terius Gesteelde-Diamant in or around 2020.

1 142. With little to no autonomy or freedom, Ms. Mangroe continued to tell
2 Dream what he wanted to hear—that she was loyal to him, that she wanted the key
3 man clause, and that she loved him.

4 143. During the second week of March 2015, after a few weeks in the
5 Residence Inn, Ms. Mangroe discovered bedbugs in her room and asked Garland to
6 place her in a new hotel.

7 144. For reasons known only to Dream, Ms. Mangroe’s request infuriated
8 him. He screamed that she was trying to take advantage of him, that she was not
9 loyal and that she was a brat. Ms. Mangroe tried desperately to explain herself, but
10 Dream’s anger continued to escalate. He told her that it was her fault that Beyonce’s
11 album was delayed, and he had the right to tell her what to do to him sexually to
12 make it up to him. He demanded that Ms. Mangroe apologize to him for the delays
13 to Beyonce’s album while he forced her to perform sexually by commanding oral
14 sex. Dream roughly shoved his penis inside Ms. Mangroe’s mouth until she was
15 choking. When she attempted to signal with her hands that she was choking, he said
16 that he was her boss and continued forcing himself inside of her. Eventually, Dream
17 began to choke Ms. Mangroe with both hands. As she began to pass out, Dream
18 continued to scream that she was taking advantage of him.

19 145. Dream stormed out and left Ms. Mangroe in shock and with several
20 bruises on her neck. Fortunately, she knew that Dream was leaving town shortly so
21 she would have a few days to recover. Dream never apologized or mentioned the
22 strangling incident again, and unfortunately it would not be the last time he became
23 physically abusive with Ms. Mangroe.

24 146. On or around March 14, 2015, Dream left Atlanta to handle work
25 obligations elsewhere. Ms. Mangroe wished him a safe flight before he took off but

1 when she did not text him the following day, Dream texted her: “U know damn well
 2 u need to check in.”

3 147. During the next few days, Ms. Mangroe made sure to say hello or good
 4 morning. When she missed one day on or around March 21, 2015, Dream texted
 5 her: “Ure not checking in.” Ms. Mangroe responded that she had checked in with
 6 Garland every day, as she was required to do.

7 148. On the following day, Dream texted Ms. Mangroe to say: “My
 8 international wife. I think it’s time for me to hit that pussy. When are you having
 9 my baby. 2023.” When Ms. Mangroe did not immediately respond, Dream texted,
 10 “Ure ignoring me now.”

11 149. Ms. Mangroe immediately responded in fear: “No I’m not ignoring
 12 you! I’m studying.” Dream then threatened Ms. Mangroe that he was going to drive
 13 over to where she was and said he was “on the way” even though Ms. Mangroe later
 14 learned he was not even in the state at that time.

15 150. When Ms. Mangroe did not respond quickly enough, Dream texted:
 16 “This is Deff ignoring. U better not be cheating on me.” As soon as Ms. Mangroe
 17 saw her messages, she told Dream that her phone was on silent to try to placate his
 18 escalating anger.

19 151. When Dream returned from his trip, Ms. Mangroe tried to focus on
 20 recording and staying focused on her goals while keeping Dream as calm as possible.

21 152. On the rare occasions that Ms. Mangroe was allowed to go into the
 22 studio, Garland said that Dream told him to make sure she was “liquored up” before
 23 getting there.

24 153. If Dream was at the studio when Ms. Mangroe arrived, he would check
 25 to make sure she was intoxicated and if he did not think she was drunk enough, he
 26 would forcefully pull her hair back and force her to drink more alcohol.

1 154. If Ms. Mangroe wore her hair in a ponytail, Dream would roughly yank
 2 her head back and pull out her hair tie.

3 155. Ms. Mangroe had become so isolated and dependent on Dream for food
 4 and shelter in such a short period of time that it became increasingly difficult for her
 5 to comprehend the reality of her situation.

6 **VII. Ms. Mangroe is Signed to Contra Paris and Epic Records**

7 156. In or around March 2015, Dream told Ms. Mangroe that Antonio “L.A.”
 8 Reid (“Reid”) reached out to him about signing her to Epic Records.

9 157. Dream said he would handle all the negotiations with Epic, refusing to
 10 include Ms. Mangroe and insisting that any questions she asked him to get a better
 11 understanding of the situation were disrespectful.

12 158. At or around the same time, Ms. Mangroe was staying at a new hotel
 13 that provided a driver who would take guests to destinations within a short distance.
 14 This was the first time Ms. Mangroe had any freedom to control when and where
 15 she could eat. She often asked the driver to take her to get food and got to know him
 16 a bit. After several weeks, the driver expressed concern for Ms. Mangroe because,
 17 as he said, she was always alone, she never left the hotel except to get food, and she
 18 did not appear well.

19 159. It was the first time that Ms. Mangroe had any real contact with anyone
 20 other than Dream and the people he surrounded himself with; she felt embarrassed
 21 and ashamed that the driver could tell something was wrong.

22 160. Ms. Mangroe knew that her physical and mental state was deteriorating
 23 and was trying to figure out a way to go back home until she had her recording
 24 contract in place that she believed could protect her from Dream’s control and abuse,
 25 especially given that most of her time was spent alone just waiting for Dream or
 26 someone from his team to tell her she needed to be in the studio.

161. Dream, who was married, had a child on the way in May 2015 so he was more distracted than usual. Ms. Mangroe used that time to ask if she could leave for a few days to visit her mother. Dream told her that she could only go home if she left all her belongings with Garland.

162. Perhaps sensing Ms. Mangroe's newfound realization of the abusive situation she was in, Dream's sexual assaults intensified. On one occasion, Dream told Ms. Mangroe that he wanted to take her to a movie. When they arrived, there was another man in the theater who they did not know. Dream demanded that Ms. Mangroe perform oral sex on him while the man watched. She said no. Dream got angry and forced Ms. Mangroe to have sex with him in the theater while the man presumably watched. It was a physically painful encounter.

163. On the same evening, Dream took Ms. Mangroe to the parking lot of Triangle Sound Studio in his sprinter van, which had been remodeled as a tour van with a mattress in the back. Once they arrived at the gated lot, Dream told Ms. Mangroe that they were not actually going to the studio, but instead he asked her to leave and enter the van from a separate entrance, at a different time than he did—seemingly in an attempt to keep his plans a secret from others present at the studio.

164. Once in the van, Dream locked the doors and pushed Ms. Mangroe into the dark back area of the van. He pinned her on the mattress in the van, took off her clothes, and started forcibly having sex with her. He pressed his full body weight onto Ms. Mangroe while covering her mouth and nose with his hands so that she was unable to breathe. He told her that he was angry that she wanted to go home and screamed at her that she was difficult and ungrateful as he forced himself on her.

165. Dream then began to choke Ms. Mangroe, demanding that she tell her “are you mine?” and instructing her to “say you’re mine.” His aggression scared Ms. Mangroe and the choking became so intense that she believes she might have

1 lost consciousness at one point during the ordeal. He told Ms. Mangroe that she
 2 better remember who she belongs to while she was gone, demanded that she tell him
 3 that she loved him, and further told her that he knows everything about her, and is
 4 the foundation of her career and of her record project. Once he finished, he
 5 instructed Garland to come to the parking lot and take Ms. Mangroe back to her
 6 hotel. Ms. Mangroe had bruises across her neck from Dream's strangulation.

7 166. Ms. Mangroe left for Amsterdam with one small bag on or around April
 8 7, 2015. At that time, Dream instructed Ms. Mangroe that she could only be in
 9 Amsterdam for few weeks as the recording contract and distribution deal were
 10 finalized and executed.

11 167. In or around April 11, 2015, Ms. Mangroe texted Dream about a
 12 Billboard Magazine interview he did that had just been published. He previously
 13 told her that he was going to discuss her as one of his new artists in the interview.
 14 She never came up in the interview, so she texted Dream to ask why she was not
 15 mentioned. It was an innocent inquiry but caused Dream to fly into a rage. He sent
 16 several pages of text messages in response saying

17

18 ...it wasn't about you it was about me, don't patronize me
 19 Channii u know I'm smarter than that and stop being so
 20 selfish...don't ever call me about something so minute
 21 again please...[you] treat me like I'm some side bitch or
 22 something or as if I'm not important just because I made
 23 u important...I'm giving up...I'll let everyone know
 24 where we stand.

25

26

27

1 168. Ms. Mangroe, who was just excited about the possibility of being
2 mentioned in the article, was completely taken aback by his reaction because he was
3 becoming more and more unpredictable. She realized that anything she asked him
4 had the potential to make him angry, and that she had no way of knowing what would
5 and would not cause such an explosive reaction. She was very thankful to be having
6 the conversation via text instead of in person.

7 169. Dream refused to speak to Ms. Mangroe for several days and she was
8 left completely in the dark about whether he was planning to move forward with Ms.
9 Mangroe's record.

10 170. Garland then texted Ms. Mangroe to say he had spoken to Dream. He
11 told her that she needed to play her role, show she was humble, show her passion
12 and loyalty, and provide a gift to Dream as a peace offering. Garland suggested
13 customized Contra Paris clothing to prove to Dream that she was committed.

14 171. Dream eventually responded to Ms. Mangroe. She was forced to
15 reiterate how grateful she was for him, tell him that he meant everything to her, and
16 so forth. She continued texting Dream good morning to ensure that she was checking
17 in as he ordered.

18 172. On or around April 16, 2015, Dream texted Ms. Mangroe to say that
19 Reid and Epic Records were going to be their partner on her record deal. This
20 essentially meant that once she signed a recording contract with Contra, she would
21 sign a distribution contract with Epic. Once both of the contracts were signed, Ms.
22 Mangroe's album could be finalized and released.

23 173. On April 21, 2015, while Ms. Mangroe was still in Amsterdam, she
24 finally signed the Contra Contract. The Contra Contract was a "recording and
25 shopping" contract that provided Contra with the exclusive rights to all audio and

1 audio visual recordings in addition to a six-month time period to enter into or
 2 substantially negotiate a distribution agreement.

3 174. The Contra Contract specifically noted that Dream was an agent of
 4 Contra, and upon information and belief, he was also the principal of the LLC.

5 175. On May 1, 2015, Ms. Mangroe then signed the Epic Records contract.
 6 On the same day, Dream texted Ms. Mangroe: “It will always be mine, not just your
 7 pussy. All of you. [U]re blood. [U]re mind. Your heart.”

8 176. Dream maintained complete control over communications concerning
 9 Ms. Mangroe’s deal and Epic—he refused to connect her to anyone directly, or even
 10 to include her in email or text chains with the executives from the major record label
 11 she was now signed to.

**12 VIII. Ms. Mangroe Meets with Representatives from Epic and Dream
 13 Becomes Jealous, Possessive, and Violent**

14 177. Ms. Mangroe had a return ticket booked to Atlanta for May 12, 2015.
 15 She texted Dream to confirm that he wanted her to return on that date but given that
 16 his son was born just a few days earlier, he told Ms. Mangroe that he would let her
 17 know when to return to Atlanta.

18 178. Finally, in late May 2015, Ms. Mangroe was told that Reid and Joey
 19 Arbagey (“Arbagey”), former Executive Vice President, A&R at Epic Records,
 20 wanted to meet her in person. She returned to Atlanta on or around May 26, 2015
 21 to prepare.

22 179. Dream told her to practice three specific records for the meeting:
 23 Married to the Game, 187, and Road. However, when they got to the studio with
 24 Reid, Dream began playing a fourth song, C.R.E.A.M.—one that Dream specifically
 25 refused to send to her to allow her to practice—in an effort to embarrass and sabotage
 26 her in front of Reid.

1 180. After Ms. Mangroe performed, Dream turned his chair toward her and
2 placed his hand on her bare inner thigh and stroked her leg in front of Reid and
3 Arbagey while the group spoke about her performance. It was humiliating for Ms.
4 Mangroe and served only to assert Dream's dominance over her.

5 181. During the group conversation, Reid said that he liked how "sexy" Ms.
6 Mangroe was, which infuriated Dream.

7 182. After Reid and Arbagey left the studio, Dream mentioned Reid's
8 comment and forcefully had sex with Ms. Mangroe in the vocal booth while Garland
9 guarded the studio door. It was so rough and painful that Ms. Mangroe began to
10 bleed vaginally. Ms. Mangroe did not want to have sex with Dream at the time, and
11 certainly did not consent to the physical violence and force he used during the
12 encounter.

13 183. During this trip to Atlanta, Ms. Mangroe celebrated her 24th birthday
14 and she posted a selfie to her social media to celebrate the occasion. Dream
15 immediately texted her to delete it. She quickly complied. Dream replied, "You
16 can't keep doing and undoing, if you don't get it just say you don't and we can move
17 on, I got my own shit to worry about." It was yet another not-so-subtle threat that if
18 Ms. Mangroe did not do exactly as she was told, Dream could destroy her career.

19 184. Ms. Mangroe flew back to Amsterdam on or around May 29, 2015 to
20 await further details about the next steps.

21 185. On or around May 19, 2015, Epic wired Ms. Mangroe's \$35,000
22 advance. It was only then that Ms. Mangroe was provided with any compensation
23 for the work she had been doing for Dream since January. Ms. Mangroe was told
24 that Dream and Tricky both received \$150,000 upon the execution of the contract.

1 186. Ms. Mangroe remained extremely confused about the next steps but
 2 became afraid to ask Dream any scheduling questions because he took that as a sign
 3 of disrespect.

4 187. She reached out to sound engineer, Schoudel, to ask if he knew anything
 5 about the schedule. She told Schoudel that Dream told her they were going to finish
 6 recording the album in Las Vegas, but that she was not given any time frame despite
 7 trying to figure it out.

8 188. Schoudel confirmed that Dream said the same thing to him and then
 9 said, “But not allowed to ask [about timing] right!? That’s what he had said to me
 10 too. Vegas...wonder when...If I hear anything, I’ll let you know.” Ms. Mangroe
 11 responded, “Yes I will let you know too!! It’s crazy right, I don’t know anything
 12 about my album, I was supposed to get a schedule. Nothing[.]”

13 189. Ms. Mangroe also started asking Dream more questions about
 14 Beyoncé’s tour because he continued to regularly tell her that she was “prepping”
 15 for it. Dream played Ms. Mangroe a song he wrote for Beyoncé that featured Jay-
 16 Z. He told Ms. Mangroe that he was not allowed to play the song for anyone but he
 17 allowed her to hear it to get her excited for the tour.

18 190. Weeks later, Ms. Mangroe mentioned to Schoudel that Dream played
 19 her a new Beyoncé song. She was excited about hearing it and asked Schoudel not
 20 to tell Dream she told him that she heard it. However, to her shock, Schoudel told
 21 Ms. Mangroe that it was an old record they had cut and that it ultimately did not
 22 make Beyoncé’s previous album. It was not part of a new album or tour. In fact, as
 23 it turned out, Beyoncé was not preparing for a tour at all. Ms. Mangroe started to
 24 realize that the dizzying whirlwind Dream had led her through was a mirage, and
 25 she started to fear that Dream never truly wanted to produce her record, but just
 26 wanted to control her physically and mentally.

1 191. In mid-June 2015, Ms. Mangroe asked Dream when she could come
 2 back to start working again. She said, “U do know u need to approve if I wanna go
 3 out there, ur the one that controls my budget. Also, I can be there this
 4 weekend...Soooo.....it’s up to you.”

5 192. After Dream responded that he thought Ms. Mangroe was flying herself
 6 to Atlanta, i.e., using her own money instead of the money in her Epic budget, Ms.
 7 Mangroe said she could do that, but she thought Dream wanted her to stay there,
 8 which she could not afford to do on her own. Dream then told her that he did not
 9 “want to burn out your budget, we are planning on finishing [the record] in Las
 10 Vegas.”

11 193. As a result, Ms. Mangroe was forced to continue waiting for Dream to
 12 provide permission to use her budget for her traveling and living expenses, or to go
 13 back into a studio to continue recording her music.

14 194. Throughout July, Ms. Mangroe continued to wait. She was fearful of
 15 asking too many questions because of the way Dream reacted. However, Dream
 16 also became angry and called her disinterested if she was not regularly keeping in
 17 touch. It was an impossible balance.

18 195. In mid-July, Dream reached out to Ms. Mangroe to say he was planning
 19 her first showcase for the label in August and was working on the radio edit for
 20 Married to the Game. Ms. Mangroe said she was looking forward to the details.
 21 Later the same day, Dream texted, “I need to fuck you now.”

22 196. The following day, when Ms. Mangroe did not immediately respond to
 23 a text message, Dream texted her “[U] better not be fuckin cheating!!! Where the
 24 fuck you at!”

25 197. In late July, Dream began pressuring Ms. Mangroe to hire Cynthia
 26 Campbell (“Campbell”), an assistant who Dream personally knew but who had little

1 experience with musicians, and to pay her \$15,000 for the first three months. He
2 also told Ms. Mangroe to move in with Campbell, presumably as a way to keep close
3 track of Ms. Mangroe.

4 198. Dream also scolded Ms. Mangroe for failing to buy Garland a gift after
5 her contracts were signed given that Garland was the person who connected her to
6 Dream.

7 199. While appreciative of Epic's \$35,000 advance, Ms. Mangroe had been
8 working and then sitting around without any compensation for many months. The
9 advance was not enough money for Ms. Mangroe to hire her own assistant, pay for
10 her living expenses, and pay Garland a finder's fee. Ms. Mangroe had no idea when
11 or if another paycheck would come.

12 200. Garland then began pressuring Ms. Mangroe to give him \$10,000 to
13 expand his security business. He said that Dream promised to pay him a finder's fee
14 but had not paid it and that he was in a precarious financial position.

15 201. For the first time, Ms. Mangroe pushed back. She told Dream that with
16 only \$35,000, she did not have enough money to pay Campbell, rent an apartment,
17 and give Garland money and/or gifts.

18 202. Dream was angry and chastised Ms. Mangroe for being selfish,
19 accusing her of not being serious about music because she could not pay for her own
20 assistant and did not treat the people who helped her get to where she was correctly.

21 203. Ms. Mangroe attempted to explain, but there was no point. Dream
22 simply continued berating her.

23 204. Soon thereafter, Dream coerced Ms. Mangroe to have sex in the
24 bathroom. He purposely banged her face against the sink causing her right eye to
25 swell and bruise. Several people in the studio asked what happened to her eye; Ms.
26 Mangroe lied and said she ran into something.

1 **IX. Ms. Mangroe Tries to Complete Her Album and is Subjected to**
 2 **Repeated Abuse by Dream**

3 205. By the end of July 2015, Ms. Mangroe was desperate to get back into
 4 the studio, finish her work, and move on to the next step in the process. She believed
 5 that being signed to Epic would provide the necessary buffer between her and
 6 Dream.

7 206. Ms. Mangroe should have been given some control over her recording
 8 budget, but Dream maintained full control over it via his role as Chairman of Contra.

9 207. Overseeing Ms. Mangroe's budget allowed Dream to book and arrange
 10 everything, so he maintained complete control over Ms. Mangroe.

11 208. As a result, when Ms. Mangroe returned to Atlanta to finish her record,
 12 she was living in mid-range hotels and AirBnBs while her recording engineers were
 13 placed in 4-star hotels. This was designed to punish and embarrass Ms. Mangroe
 14 because Dream was angry that she requested a new hotel during her last stay.

15 209. When Ms. Mangroe questioned why those supporting her album were
 16 placed in better hotels than she was, Dream made snide remarks about her only
 17 wishing she could stay in a 4-star hotel. He called her ungrateful.

18 210. Ms. Mangroe got back into the studio in early August 2015. Dream and
 19 Tricky began demanding that she pay for the food they ordered. Often times, Dream
 20 would not touch the food—it was just a test and a way for Dream to control the small
 21 amount of money she was given. Dream also made Ms. Mangroe order champagne
 22 and cupcakes for the studio personnel. He said that she needed to learn how to treat
 23 the people supporting her, which was ironic given the way he treated her.

24 211. Dream's abusive behavior continued to escalate. While recording in
 25 August 2015, another artist complimented Ms. Mangroe's shoes, which angered

1 Dream. He locked Ms. Mangroe into a room off of the studio and sexually and
2 physically assaulted her while Garland guarded the door.

3 212. On one occasion, Ms. Mangroe's A&R at Epic, Ericka Coulter
4 ("Coulter"), joined Dream and Ms. Mangroe in the studio. During this session,
5 Coulter personally witnessed Dream pulling Ms. Mangroe's hair tie out, pulling her
6 hair back to open her mouth, and forcibly pouring vodka down her throat. Coulter
7 also saw Dream touch Ms. Mangroe's body while in the studio. When Ms. Mangroe
8 caught Coulter's eye, she motioned to her, asking if she saw what just happened and
9 suggesting she was uncomfortable. Coulter brushed off Dream's violent actions.
10 Coulter also saw explicit sexual text messages between Dream and Ms. Mangroe
11 during this session, leaving no doubt that she knew what Dream's true intentions
12 with Ms. Mangroe were.

13 213. Around the same time, Dream told Ms. Mangroe that he got his gun
14 license back and could start carrying his own guns again. In a show of violent
15 machismo, Dream, Garland, and others arranged for Dream's multiple firearms to
16 be returned to him in the parking lot of Tricky's studio by means of parking two cars
17 next to each other and ostentatiously moving guns from one car to the other. Ms.
18 Mangroe witnessed this entire charade and was terrified of Dream's comfort with
19 guns.

20 214. After this, Dream regularly kept a gun on him. When he forced Ms.
21 Mangroe to have sex, he would often place the gun next to her as a warning.

22 215. Ms. Mangroe was becoming increasingly isolated from her family. She
23 spent so much of her time worrying about keeping Dream happy that she had little
24 time to focus on anything else.

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1 216. Dream began getting pushy about meeting Ms. Mangroe's mother. She
2 tried to put it off because she was afraid that Dream would hurt her mother or that
3 her mother would see Dream's abuse.

4 217. Eventually, Ms. Mangroe's mother arrived in Atlanta while Ms.
5 Mangroe was recording at the studio. Ms. Mangroe's mother went to the studio to
6 pick up Ms. Mangroe and met the sound engineer, Nate Alford ("Alford").

7 218. When Alford told Dream that he met Ms. Mangroe's mother, Dream
8 was furious because Alford met her before he did.

9 219. Dream was livid and pulled Ms. Mangroe to the staircase of the studio.
10 While in the staircase, Dream forcefully pulled Ms. Mangroe's dress up, forced her
11 down on the stairs, and proceeded to forcibly rape her from behind while he held her
12 arms with one hand and holding the collar of her dress with the other. Ms. Mangroe
13 was unable to move, with Dream completely controlling her body. He pulled the
14 dress collar tightly around her neck, and Ms. Mangroe gasped for air and begged
15 him to stop choking her. He pulled on the collar even harder, causing Ms. Mangroe's
16 voice to distort, and eventually she was gasping for breath. He continued to pull so
17 intensely at the collar around her neck that Ms. Mangroe heard the seams of her dress
18 rip. While he raped her, Dream scolded her, saying that she was difficult, that she
19 did not respect him enough, and that he did everything for her. During this ordeal,
20 Ms. Mangroe thought she would not survive the attack.

21 220. Ms. Mangroe's mother did not witness the rape or the strangling, but
22 she was concerned about her daughter. She said she felt like she was losing her and
23 was concerned about Dream.

24 221. Ms. Mangroe tried to assuage her mother's worry. She admitted that
25 Dream had been sexually and physically aggressive but lied to her mother by
26 insisting that it had gotten better.

1 222. Dream's abuse was escalating to the point that it was becoming
2 increasingly difficult to hide it from people as he was regularly flying into a rage
3 over everything. Dream seemed obsessed over Ms. Mangroe's alleged lack of
4 gratitude and the fact that she refused to use her small advance to buy him, Garland,
5 and others gifts and/or hire his friend. The fact that Ms. Mangroe said no to him was
6 simply something that Dream could not get over.

7 223. In early August 2015, Dream told Ms. Mangroe that he found her a
8 manager named Gee Roberson ("Roberson") who was a good friend of his who
9 managed Drake and Nicki Minaj. Ms. Mangroe was thrilled because she desperately
10 wanted to find a way to put distance between her and Dream while fulfilling her
11 contractual obligations to Contra. She thought that perhaps her new management
12 could protect her. However, things continued to escalate.

13 224. On or around August 15, 2015, Dream told Ms. Mangroe to meet him
14 at the studio. Ms. Mangroe went to Silent Studios but Dream did not show up. The
15 following day, Dream texted Ms. Mangroe, "...I don't feel like we have the same
16 interest for each other and I dropped something yesterday and waited on you and
17 didn't hear a word...We had a good ride but truthfully I can't do it for you and it's
18 lopsided."

19 225. Ms. Mangroe responded that she was there, and he never showed up.
20 Dream said he was at Red Zone Studio and that she should have known to ask which
21 studio and not assumed it was Silent Studios. He then said, "Please end text after
22 this and have whoever else contact me from now on thank you and good night, and
23 your [sic] welcome." He then continued, "Don't contact me about anything about
24 this album and if you wanna have a respectful conversation with me I'll you know
25 when I get the time, but not right now."

1 226. Later that evening, Tricky texted Ms. Mangroe that she could come
2 hang at the studio. Ms. Mangroe reported to Tricky, who was a partner at Contra,
3 what Dream had been doing to her. Specifically, she stated that “I haven’t told u a
4 lot but I can’t take it anymore and I don’t want [the] music to suffer because we do
5 great things but I can’t be on [t]his roller coaster ride of threats of ending the project
6 [if] I don’t please [D]ream or if I misunderstand something, so many times has he
7 yelled at me for the littlest things! You are a part of [C]ontra Paris too and I can’t
8 take it anymore!!” Tricky simply responded, “Oh. I’ll speak to him.”

9 227. Soon thereafter, Ms. Mangroe left the AirBnB where Dream had put her
10 up and booked a hotel room near the airport. She was terrified, but realized she
11 needed to escape the months of fraud and violence she had endured at Dream’s
12 hands.

13 228. Ms. Mangroe confided in Coulter, sharing with her by phone on August
14 17, 2015 that Dream was sexually and emotionally abusive, had been violent with
15 her, and was preventing her from finishing her record. At first, Coulter said that “as
16 a woman,” she understood and would take care of Ms. Mangroe. Within the hour,
17 however, Coulter had spoken to Dream, and told Ms. Mangroe that she needed to
18 figure out a way to work with Dream again, despite being told of the pattern of abuse
19 Ms. Mangroe had endured.

20 229. Ms. Mangroe then confided in Mark Stewart (“Mark”), Dream’s
21 manager, that Dream was sexually and physically abusive and that it had gotten
22 increasingly worse, and she needed help to get away from him.

23 230. Mark seemed genuinely concerned about Ms. Mangroe’s safety, but
24 told Ms. Mangroe that it seemed like a personal problem that he did not want to be
25 involved in. But of course, far from being exclusively a “personal” issue, Dream’s
26

1 abuse of Ms. Mangroe was part and parcel of his professional persona and his
2 business of producing and writing music.

3 231. Ms. Mangroe reiterated to Mark that it was a dangerous situation and
4 that she did not feel safe staying in the hotel because Dream and Garland had such
5 easy access to her. She also told Mark that for her own safety, she would no longer
6 be alone in a room with Dream or Garland.

7 232. On or about August 19, 2015, Mark finally agreed that he would figure
8 out a solution. The following day, he agreed to arrange a one-way plane ticket to
9 Los Angeles under the excuse that Ms. Mangroe was meeting with Coulter. The
10 ticket was paid for by Epic.

11 233. When Ms. Mangroe arrived in Los Angeles, she called Roberson to
12 explain the abusive nature of her relationship with Dream. Roberson brought Jean
13 Nelson and J. Erving (“Erving”) to the meeting. During the meeting, Roberson said
14 that he would handle Dream and Erving would serve as Ms. Mangroe’s day-to-day
15 manager.

16 234. On August 21, 2015, Ms. Mangroe then met with Coulter and again
17 reiterated that Dream was abusive and controlling. Ms. Mangroe made clear that
18 regardless of Dream, she was committed to completing the record and moving
19 forward with her contract but that she needed to be protected from him.

20 235. Coulter informed Ms. Mangroe that Dream was withholding the music
21 she recorded with him from Epic Records. Pursuant to the contracts she signed, Ms.
22 Mangroe was obligated to turn over music to Epic within a specific timeframe.

23 236. Ms. Mangroe asked her new management and others at Epic for help
24 intervening in this situation, retrieving her music, and extricating her record from
25 Dream’s grasp. For many months, Dream refused to meet with her, and even when
26 he met with her management, he refused to turn over Ms. Mangroe’s music. Having

1 had her trust completely betrayed by Dream, she was very concerned that her
 2 management no longer had her best interests in mind.

3 237. Indeed, in early November 2015, Ms. Mangroe was finally scheduled
 4 to meet with representatives at Epic, including Reid, in New York to discuss the
 5 future of her album. Tricky; Sylvia Rhone, the then-President of Epic Records;
 6 Arbagey; and a full marketing team were also present.

7 238. Shortly before the meeting with Reid began, Dream texted Ms.
 8 Mangroe: “Oh so you tried to play me. Ok...I leave u with this. That record is a
 9 mistake if u put it out. Don’t ever say I didn’t look out.”

10 239. Ms. Mangroe had no idea what Dream meant but knew he did it to rattle
 11 her before her meeting with Reid. She did her best to ignore it and hold it together
 12 during the meeting.

13 240. It was a pivotal moment in Ms. Mangroe’s career. Much to her surprise,
 14 however, Erving was a no-show. Instead, he sent a young intern in his place. It was
 15 evident during the meeting that Reid found it offensive that Erving did not bother to
 16 show up for the meeting. Reid asked Ms. Mangroe where he was; she had no answer.

17 241. Ms. Mangroe did her best to keep the meeting on track and reiterate
 18 how much she wanted to move forward and make the best record possible for Epic.
 19 She told Reid that she had worked for ten years to get to where she was but that she
 20 was not getting any of her music from Dream and his team and did not know what
 21 to do. She confirmed that she wanted to move forward but there was a problem
 22 standing in the way. Rhone and Reid both responded “Dream” at the same time.
 23 Reid then asked Tricky to speak to Dream about the situation.

24 242. Surprisingly, Tricky also voiced concerns during the meeting that
 25 Dream was asking Ms. Mangroe to sing songs that were not culturally appropriate
 26 based on her background. In particular, he mentioned that one of the songs

1 references Ms. Mangroe and “rastas.” Tricky told Reid that Ms. Mangroe had no
2 say in what she was singing and that if she was found to be engaging in cultural
3 appropriation, it would be an issue.

4 243. Ms. Mangroe left the meeting believing that Reid and his team
5 understood the situation with Dream and would help. At the time, Reid appeared to
6 agree that they should move forward with other producers.

7 244. Reid also gave Ms. Mangroe his direct phone number and told her to
8 call if she needed anything.

9 245. However, in early December 2015, Erving suddenly told Ms. Mangroe
10 that Reid wanted Dream to be involved in the record again.

11 246. Ms. Mangroe was terrified at the prospect of having to record with
12 Dream again, but told Erving that she was professional enough to do it if required;
13 she asked Erving if he could at least to try to arrange work with other producers first
14 with the hope that she would not be forced to work with Dream.

15 247. Erving replied that they were ready to work with other producers but
16 that they needed to be careful about the situation with Dream because of the contracts
17 Ms. Mangroe signed.

18 248. It was, quite plainly, a no-win situation for Ms. Mangroe. While she
19 remained under contract with Dream via Contra, he refused to send any music or
20 schedule studio time.

21 249. Ms. Mangroe spent the first few months of 2016 trying to figure out the
22 next steps. She texted Coulter in late January and said, “I’m a little lost as to why
23 I’m still not in the studio yet, it’s been forever and I wanna move forward! Do u
24 know what it is? Is it because me and dream had a dispute or is it something else?
25 Last sesh was in Atlanta in August! Trying to get some clarity from all sides.”

1 250. In February 2016, Ms. Mangroe was told that Epic finally approved a
2 budget for her to shoot a video for Married to the Game. Ms. Mangroe was never
3 informed what the budget was or how it was approved, and when she pressed for
4 that information, she was stonewalled.

5 251. Ms. Mangroe told Erving to ensure that Dream and his team were
6 copied on all communications related to the video shoot because she wanted to
7 guarantee that she was abiding by her contractual obligations.

8 252. Erving, however, said that Dream refused to collaborate or respond,
9 which delayed the process. Eventually, Erving said they could not continue waiting
10 for Dream to respond and had to move forward. As Erving said to Ms. Mangroe,
11 “[Dream] is already withholding music; we gotta move now.”

12 253. Finally, in March 2016, the video shoot for Married to the Game was
13 scheduled.

14 254. Ms. Mangroe immediately went to work figuring out the vision and
15 look for the video. She asked her management to always keep Dream in the loop,
16 particularly because she still had no control or say over the budget. Ms. Mangroe’s
17 management sent Dream the treatment for the video – he never responded or
18 provided any input.

19 255. On the day of the shoot, Erving once again did not show up. Ms.
20 Mangroe was given a bag of generic clothes that did not fit the style of the shoot,
21 and all of the vision boards she created were ignored.

22 256. The video was incredibly important to Ms. Mangroe’s career. It was
23 her moment to show Reid and Epic Records how she could be marketed to the world
24 and to convince Epic to increase the recording budget so she could get back into the
25 studio.

1 257. Dream called her to say he heard the video was terrible and said, “this
 2 is what you get when you don’t listen to me...you got played.”

3 258. In April 2016, Ms. Mangroe flew to Los Angeles using her own money
 4 to do reshoots of the video because she cared so deeply about getting it right.

5 259. A few weeks later, Erving confirmed to Ms. Mangroe that he sent the
 6 revised video to Reid and the Epic Records team.

7 260. In May 2016, Erving told Ms. Mangroe that Reid loved the video. Ms.
 8 Mangroe was thrilled and said she was anxious to move things along.

9 261. Also in early May 2016, Ms. Mangroe’s product manager at Epic
 10 Records, Franz De Los Reyes, texted her to say that the video was “dope” and that
 11 they were planning the premiere.

12 262. However, Coulter suddenly told Ms. Mangroe that Dream complained
 13 about the video, that nobody at Epic Records liked the video, and that she should
 14 have worked with Dream on the video. Ms. Mangroe was shocked and confused—
 15 she had little insight into why she was getting such mixed messages from those
 16 working with her at Epic, and had the sense that Dream was continuing to put up
 17 obstacles in her career.

18 263. Ms. Mangroe pleaded with Coulter to see what Dream was doing – he
 19 was playing games and creating roadblock after roadblock. Ms. Mangroe said,
 20 again, that her team spent six weeks reaching out to Dream about the video, sent him
 21 the treatment to the video, and he refused to respond. Now that it was complete,
 22 Dream was complaining simply to derail her career again.

23 264. Coulter, who knew about Dream’s abuse, refused to provide any help
 24 or solution to Ms. Mangroe. Instead, she simply said that Ms. Mangroe needed to
 25 “get on the same page as Dream” for things to proceed. She also left unanswered

1 Ms. Mangroë's repeated questions about who was in possession of her music—even
2 though as her label, Epic should have been able to provide this information to her.

3 265. Ms. Mangroe did not know where to turn. Erving, her manager, told
4 her that Reid loved the video; Coulter, who worked at Epic, told her that nobody at
5 Epic liked the video; and Dream seemed to be taking great joy at the confusion and
6 chaos it was causing.

7 266. Ms. Mangroe pleaded with Coulter to arrange a meeting with Reid to
8 explain what happened and figure out how everyone could move forward. Reid,
9 who had changed his phone number, was no longer directly reachable.

267. On June 25, 2016, Ms. Mangroe attended Epic Fest, a music festival
showcasing artists signed to the Epic Records label. She hoped that would provide
the opportunity to get in front of Reid for a discussion about next steps.

13 268. Ms. Mangroe was scheduled to go to the festival with Erving, but just
14 thirty minutes before they were supposed to leave, Erving said he was still in Las
15 Vegas and would meet her there. Ms. Mangroe was shocked but determined to go.

16 269. While she was at Epic Fest, Dream called Ms. Mangroe and told her
17 that Epic was “washing their hands” of her. Ms. Mangroe did not know what he was
18 talking about and thought that he was simply trying to harass her.

19 270. Ms. Mangroe then ran into Reid, Arbagey, and Coulter. Ms. Mangroe
20 asked Reid if they could talk. Reid responded by saying, “hey baby, maybe later, we
21 gotta go,” and grabbed Arbagey and ran off. Coulter then looked at Ms. Mangroe
22 with a smirk and said “talk to your manager, why are you here? You’re dropped.
23 [Erving] should have talked to you already.”

24 271. Erving, despite stating that he would meet Ms. Mangroe at Epic Fest,
25 never appeared.

272. Ms. Mangroe was caught off guard and felt humiliated because she was slowly realizing that perhaps everyone knew something that she was never told.

273. Ms. Mangroe then spoke to Rhone and asked if she knew what Coulter meant. Rhone said that she had no idea and offered to look into it.

274. Ms. Mangroe reached out to Erving as soon as possible. He admitted to her that he heard through the grapevine that she may be dropped by Epic; however, given that there was no official notification or anything more than a rumor, he did not want to bother Ms. Mangroe with the rumor.

275. On July 15, 2016, Ms. Mangroe got the official word that Epic no longer wanted to distribute her music because Dream failed to deliver the records. Arbagey told Ms. Mangroe that she was “dropped” because Contra failed to deliver the records and Dream was difficult to work with. Yet, nobody at any point sat down with Ms. Mangroe to discuss the situation with her. She was left in the dark throughout the entire process despite both Contra and Epic having a signed contract and owing corporate responsibilities to her, and despite agents of both entities knowing that Ms. Mangroe had been the subject of Dream’s violent and coercive manipulation, which they knew or should have known were predicated of fraudulent promises of record contracts, Grammys, and opening for Beyonce.

276. To this day, Ms. Mangroe is in the dark about whether or not she is still bound to Dream and Contra Paris, who owns her music rights, or where the recordings of her work are located.

277. Dream got what he wanted—he caused so much chaos and confusion with Epic that they simply no longer wanted to deal with Ms. Mangroe, who he had successfully duped into a fraudulent and coercive sexual relationship.

278. It was a devastating blow to a young, talented artist who had done everything possible to survive the situation with Dream and move forward. Yet, it

1 became abundantly clear that Dream was only interested in an artist who was fully
2 compliant with all of his demands. When Ms. Mangroe finally found the courage to
3 stand up to him – ever so slightly – he no longer found her to be worthy of his time
4 and set out to ensure that nobody else would work with her either.

5 279. Within a few weeks of Epic notifying her team that they did not want
6 to proceed, Ms. Mangroe’s management team dropped her as well.

7 280. Not only did Dream ruin Ms. Mangroe’s chance with Epic Records, he
8 also ensured that she could not work for the next decade by refusing to officially
9 release her from her contract. As a result, if she recorded music she would be in
10 breach of her Contra agreement. She begged to be released from Contra, but they
11 continued to ignore her requests.

12 281. Ms. Mangroe lost everything – her ability to work as an artist, her
13 ability to work in the United States, and her ability to live a life free from the trauma
14 Dream inflicted.

15 **X. Ms. Mangroe’s Suffering Following Dream’s Abuse and Manipulation**

16 282. Ms. Mangroe has not been the same since Dream’s abuse and her
17 experience with Contra and Epic, and she believes that the experience broke her as
18 an artist and as a woman.

19 283. When she finally understood the devastation Dream’s actions caused,
20 she lost her passion for music and life in general. She spent several years rarely
21 leaving her house.

22 284. When Ms. Mangroe would try to sing, she would have flashbacks and
23 panic would set in, and she just could no longer do what her entire life purpose had
24 been previously.

25 285. Dream’s sexual assaults, physical violence, and manipulation weighed
26 on Ms. Mangroe for almost a decade.

1 286. In late December 2016, Ms. Mangroe's general practitioner referred her
 2 for treatment of anxiety and depression because she was suffering from panic
 3 attacks, insomnia, and lethargy. She could not speak about the sexual abuse Dream
 4 inflicted until 2018, and then worked in therapy to attempt to get her life back.

5 287. However, Ms. Mangroe's life will never be the same. She lost a decade
 6 of her life due to Dream's abuse and the willingness of Contra, Epic, and Reid to
 7 look the other way. She remains unable to engage in her work as a recording artist
 8 due to the pain and devastation she endured.

9
FIRST CAUSE OF ACTION
 10 **Sex Trafficking under 18 U.S.C. § 1595**
 11 *Against All Defendants*

12 288. Plaintiff repeats and realleges each and every allegation in all of the
 13 preceding paragraphs as if fully set forth herein.

14 289. Plaintiff is a victim of sex trafficking within the meaning of 18 U.S.C.
 15 § 1591(a) and (b) and is therefore entitled to bring a civil action under 18 U.S.C. §
 16 1595.

17 290. The Defendants' acts and omissions, taken separately and/or together,
 18 as outlined above, constitute a violation of 18 U.S.C. § 1595. Specifically,
 19 Defendant Dream and Contra Paris perpetrated sex trafficking of Ms. Mangroe by
 20 requiring her to engage in forced sexual acts in multiple jurisdictions, and all
 21 Defendants benefitted from Dream's venture by holding Ms. Mangroe, an artist
 22 signed with Defendants Contra Paris and Epic Records, captive to Dream's demands
 23 and desires. At all relevant times, Defendants participated in and facilitated the
 24 harboring and transportation of Plaintiff for purposes of sex induced by force, fraud,
 25 or coercion.

291. The Defendant Corporations have financially and otherwise benefited as a result of these acts and omissions by keeping Dream, the volatile and explosive owner of the Defendant Contra Paris, and an influential and prolific songwriter for today's biggest stars, satisfied. They benefited from facilitating his behavior to the extent it kept their relationship with the talented musician viable and ensured continued profit from his work.

292. Dream, and Defendants Contra Paris and Epic Records, formed a venture as defined by 18 U.S.C. § 1595 given that they constituted a “group of two or more individuals associated in fact, whether or not a legal entity.”

293. As a direct and proximate result of Defendants' unlawful conduct as alleged hereinabove, Plaintiff has suffered physical injury, severe emotional distress and anxiety, humiliation, embarrassment, post-traumatic stress disorder, economic harm, and other consequential damages.

294. Plaintiff also seeks reasonable attorneys' fees as provided under 18 U.S.C. § 1595(a).

SECOND CAUSE OF ACTION
(Sexual Battery)
Against Defendant The-Dream

295. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

296. Defendant Dream committed a battery against Plaintiff when he engaged in unlawful, intentional, and offensive touching or application of force to Plaintiff's person when he forced her to engage in unprotected sex by restraining her movement after she said no. Plaintiff did not act freely and voluntarily, and the actions were against Plaintiff's will, as defined in Cal. Penal Code § 243.4.

297. As a result of Dream's alleged conduct, Plaintiff has suffered severe emotional distress, humiliation, embarrassment, anxiety, economic harm, and other consequential damages.

298. The conduct of Dream described above was willful, wanton, and malicious. At all relevant times, Dream acted with conscious disregard of Plaintiff's rights and feelings, acted with knowledge of or with reckless disregard for the fact that his conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause fear, physical injury, and/or pain and suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive and exemplary damages from Dream according to proof at trial.

299. This cause of action is timely under California's Sexual Abuse and Cover-Up Accountability Act, AB 2777 because it is "based on conduct that occurred on or after January 1, 2009, and is commenced []after January 1, 2019," and is thereby revised by Cal. Code Civ. Proc. § 340.16(b)(3).

THIRD CAUSE OF ACTION
(Rape)
Against Defendant The-Dream

300. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

301. Defendant Dream committed a rape against Plaintiff, as defined in Cal. Penal Code § 261(4)(D), as Plaintiff was incapable of resisting because she was not aware, knowing, perceiving, or cognizant of the essential characteristics of the act due to Defendant Dream's fraudulent representation that the sexual penetration served a professional purpose when it served no professional purpose.

302. As a result of Dream's alleged conduct, Plaintiff has suffered severe emotional distress, humiliation, embarrassment, anxiety, economic harm, and other consequential damages.

303. The conduct of Dream described above was willful, wanton, and malicious. At all relevant times, Dream acted with conscious disregard of Plaintiff's rights and feelings, acted with knowledge of or with reckless disregard for the fact that his conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause fear, physical injury, and/or pain and suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive and exemplary damages from Dream according to proof at trial.

304. This cause of action is timely under California's Sexual Abuse and Cover-Up Accountability Act, AB 2777 because it is "based on conduct that occurred on or after January 1, 2009, and is commenced []after January 1, 2019," and is thereby revised by Cal. Code Civ. Proc. § 340.16(b)(3).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays judgment be entered in her favor against Defendants, and each of them, as follows:

A. For a money judgment representing compensatory damages including consequential damages, lost wages, earning, and all other sums of money, together with interest on these amounts, according to proof;

B. For a money judgment for mental pain and anguish and severe emotional distress, according to proof;

C. For punitive and exemplary damages according to proof;

D. For attorneys' fees and costs:

E. For prejudgment and post-judgment interest; and

1 F. For such other and further relief as the Court may deem just and
2 proper.

3 **JURY DEMAND**

4 Plaintiff hereby demands a trial by jury on all issues of fact and damages stated
5 herein.

6 Dated: June 4, 2024

7 Respectfully submitted,

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